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October 24, 2024

**VIA ECF**

Hon. André M. Espinosa, U.S.M.J.  
U.S. District Court of New Jersey  
Martin Luther King Building & U.S. Courthouse  
50 Walnut Street  
Newark, NJ 07102

Re: Airtech International Inc. v. Yim, et al.; Case 2:22-cv-00668-MEF-AME

Dear Judge Espinosa:

The parties write jointly to address a minor miscalculation set forth in the Jointly Proposed Amended Discovery Schedule enclosed in our October 17, 2024 (*D.E.* 267) submission to Your Honor.

In that October 17, 2024 schedule, the deadline to submit an “opposing expert report[] to those for which a party has the burden” is June 20, 2025. That schedule also applies that same June 20, 2025 deadline to the submission of a “[r]ebuttal/responsive expert reports to opposing reports to those for which a party has the burden.”

The parties agree that it would be extremely onerous, if not impossible, for a party to submit a rebuttal expert report on the same date it received the opposing expert report. The parties thus consent to extending the June 20, 2025 deadline for this rebuttal report to July 11, 2025. The following Jointly Proposed Amended Discovery Schedule reflects this updated deadline, which is emphasized below.

We thank the Court for its time and attention to this litigation.

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**II. Jointly Proposed Amended Discovery Schedule**

EVENT	DATE
Date by which Defendants will produce documents from Gmail account <a href="mailto:airtechuscom@gmail.com">airtechuscom@gmail.com</a>	Completed
Letters to be exchanged by this date setting forth all additional sources of files to be collected and searched for responsiveness to all prior document requests.	November 15, 2024
Date by which the parties will respond to the document source letters identifying sources of collection and production not yet collected, searched, and produced.	November 22, 2024
Letters to be exchanged by this date setting forth all open deficiencies to be corrected in responses to written party discovery requests served before the date of this Order.	November 27, 2024
Date by which the parties will serve a written response to the discovery response and production deficiency letter.	December 16, 2024
Last day for written party discovery requests.	December 24, 2024
Letters proposing agreements regarding non-party discovery to be exchanged by this date.	January 7, 2025
Last day to serve subpoenas.	January 14, 2025 <sup>1</sup>
Party document production to be substantially complete.	February 24, 2025
Interim Joint Status Report due.	February 28, 2025
Parties to notice all continuation and new party depositions.	March 3, 2025
Parties to agree on deposition schedule and file joint letter regarding any dispute over party deposition schedule.	March 7, 2025
First day party depositions can be conducted.	March 10, 2025
Last day party depositions can be conducted.	April 11, 2025

<sup>1</sup> This deadline does not apply to discovery of non-party witnesses located outside the United States. To the extent such discovery is available in the Republic of Korea pursuant to the Hague Evidence Convention, the processing of Letters of Request and conduct of any authorized discovery will take at least three months and more likely six months to a year.

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Close of fact discovery.	April 18, 2025 <sup>1</sup>
Initial expert reports due on issues for which a party bears the burden.	May 20, 2025
Initial expert reports due on issues for which a party does not bear the burden	June 3, 2025
Opposing expert reports to those for which a party has the burden	June 20, 2025
Opposing expert reports to those for which a party does not have the burden	July 3, 2025
Rebuttal/responsive expert reports to opposing reports to those for which a party has the burden.	<b><i>July 11, 2025</i></b>
Rebuttal/responsive expert reports to opposing reports to those for which a party does not have the burden.	July 17, 2025
Expert discovery deadline and close of all discovery.	July 18, 2025 <sup>1</sup>

Respectfully submitted,

**CHO LAW GROUP, LLC**By: /s/ Kenneth K. Cho  
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Co-counsel appearing *Pro Hac Vice***BRACH EICHLER LLC**By: /s/John Simeone  
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